

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

DAMON LONG

Case No.

2:21-mj-30219

Judge: Unassigned,

Filed: 05-11-2021 At 10:11 AM

CMP USA v. Damon Long (krc)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 11, 2021 in the county of Macomb in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 922(g) (1)

Felon in Possession of a Firearm

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: May 11, 2021

City and state: Detroit, Michigan



Complainant's signature

Joshua Paczok, Special Agent, FBI

Printed name and title



Judge's signature

Hon. Patricia T. Morris, United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Joshua Paczok, having been duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation and have been so employed since March of 2018. I am currently assigned to the Detroit FBI Violent Gang Task Force (VGTF) and participate in investigations into street gangs committing various violations of federal law, including narcotics and weapons trafficking and violent crime. Prior to my current employment, I was employed as a United States Border Patrol Agent assigned to the Laredo North Station in Laredo, Texas. During my time as a Border Patrol Agent, I interdicted humans and narcotics being trafficked by violent criminal organizations. I also initiated investigations involving narcotics, human trafficking and other activities of violent criminal organizations.

2. I am submitting this affidavit in support of a criminal complaint alleging that DAMON LONG has violated Title 18, United States Code Section 922(g), "Felon in Possession of a Firearm". Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe the defendant committed the offense alleged in the complaint.

3. This affidavit is based on my personal knowledge, Detroit Police Department reports and information provided to me by other law enforcement agents and witnesses.

4. Damon Long has a prior felony conviction for which he faced a possible term of imprisonment greater than one year. On January 19, 2018, in Third Circuit Case 17-009745-01-FH, LONG was convicted of felony carrying concealed weapon (MCL 750.227) and sentenced to probation, which was closed on March 10, 2021. LONG is therefore prohibited from possessing firearms.

5. My investigation has revealed reason to believe that DAMON LONG resides at XXXXX Couwlier, Avenue, Warren, Michigan (Couwlier Residence) with his long-term girlfriend and her young child. Probable cause exists that DAMON LONG has control over this location and has constructive possession of the items within.

6. From March 2021 continuing to present, with the assistance of continuous electronic surveillance, which is active on the location, I observed Damon Long enter and leave from the Couwlier Residence on a regular basis. I have observed Damon Long leave from the Couwlier Residence and drive away in a black Jeep Cherokee with stainless steel-colored rims which was usually parked on the street in front of the Couwlier Residence. I have observed Damon Long return to the Couwlier Residence, in the same vehicle, on most days. On numerous

occasions, I observed Damon Long enter the Couwlier Residence by opening the front door and entering by himself. On several occasions, I have observed Damon Long drive away from the Couwlier Residence in a light blue Chrysler 200, which is almost daily parked in the driveway of the Couwlier Residence.

7. On February 18, 2021 the FBI conducted physical surveillance on the Couwlier Residence. During that surveillance, a black jeep Cherokee, with stainless steel-colored rims was observed parked on the street in front of the Couwlier Residence. Records checks on the license plate returned to a 2014 Jeep Cherokee registered to DAMON LONG. Based on my observations made with the help of electronic surveillance, it appears that this vehicle has usually been parked outside of the Couwlier Residence, nearly every night, since at least March of 2021.

8. Through my investigation, I have learned the identity of DAMON LONG's long-term girlfriend. Law enforcement databases indicate that the Couwlier Residence is associated with DAMON LONG's long-term girlfriend. With the assistance of electronic surveillance, I have seen the person who I know to be DAMON LONG's long-term girlfriend come and go from the Couwlier Residence on a regular basis from March 2021 to the present.

9. While I have been conducting electronic surveillance on the Couwlier Residence, I have not observed any other adults entering and leaving the premises

with regularity, like DAMON LONG and his girlfriend.

10. Based on the forgoing, it is reasonable to believe that DAMON LONG and his girlfriend have lived at the Couwlier Residence since at least January of 2021 and continue to be the sole adults residing there.

11. On May 11, 2021, the FBI Detroit Violent Gang Task Force executed a search warrant at the above described residence of DAMON LONG.

12. During the execution of this search warrant, Agents found multiple firearms and ammunition. In the master bedroom, which also contained DAMON LONG's clothing, a Taurus Model G2C 9mm pistol bearing serial number ABH79529, was found on the dresser. Mail addressed to DAMON LONG was located in the same room, and DAMON LONG came from the direction of that bedroom when agents found him inside the home.

13. Another firearm, a Glock 19, Gen. 5 9mm Pistol, with serial number BNSM186 was located underneath a chair in the living room, inside of a black Gucci "fanny pack" style satchel. I have recently seen DAMON LONG wearing a "fanny pack" on his shoulder resembling the one located.

14. The following firearms were located in a plastic rifle box in the attic:

- an Anderson Rifle AR pistol bearing serial number 19801790
- an Anderson Manufacturing AM 15 .223 Rifle S/N:18281822 (with two magazines

15. The following firearms were located in a metal pistol safe in the attic:

- Glock 23. 40 caliber pistol bearing serial number GHX307
- Glock 22. 40 caliber pistol bearing serial number ABH799529
- Witness P-5 model CAT 11398 bearing serial number EA81473
- Ruger SR9 9mm bearing serial number 332-09002
- Glock 17 bearing serial number LDR480
- Keltec P-11 9mm, bearing serial number AY734

16. A Zastava MDLPAP M92PV 7.62x39 mm pistol bearing serial number M92PV030686 was located in a blue suitcase in the attic.


17. According to Special Agent Michael Jacobs (ATF), an interstate nexus expert, the above described firearms are not manufactured within the state of Michigan, therefore, this firearm must have travelled in interstate commerce.

18. Based on the facts set forth above, I believe that probable cause exists to conclude that DAMON LONG knowingly possessed a firearm as a felon, in violation of Title 18, U.S.C. Section 922.



Joshua Paczok
Special Agent, FBI

Sworn to before me and signed in my presence and/or by reliable electronic means.



Hon. Patricia T. Morris
United States Magistrate Judge
Dated: May 11, 2021